



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

OCT 30 2013

REPLY TO THE ATTENTION OF: E-19J

Brenda Halter, Forest Supervisor  
Superior National Forest  
8901 Grand Avenue Place  
Duluth, Minnesota 55808

**Re: Boundary Waters Canoe Area Wilderness (BWCAW) Non-native Invasive Plant (NNIP) Management Project Final Environmental Impact Statement (Final EIS) and Record of Decision, Superior National Forest (Forest), Cook, Lake, and St. Louis Counties, Minnesota - CEQ No. 20130251**

Dear Ms. Halter:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act, we are providing comments on the above-mentioned documents dated August 2013.

As indicated in the ROD, the Forest Service has decided to implement Alternative 2, an integrated pest management approach. Alternative 2 was the Forest Service's Proposed Action as stated in the Draft EIS. The Draft EIS discussed the ineffectiveness of hand pulling for most NNIPs in the BWCAW. The Forest Service has determined that, while there will be a short-term impact to the natural quality of the BWCAW from herbicide use, the long-term benefits of herbicide use to contain and eradicate NNIPs outweigh short-term impacts. A number of mitigation measures have been included in the project design.

In our March 18, 2013 letter, EPA assigned a rating of "Environmental Concerns – Insufficient Information" to the Draft EIS. This rating was based on the potential discharge of pesticides to surface waters in the BWCAW, pesticide labeling requirements, proper pesticide storage and transport, training for pesticide applicators, and information concerning Regional Forester's Sensitive Species.

After reviewing the Final EIS and ROD and numerous conversations between Jack Greenlee, Plant Ecologist for the Superior National Forest and Margaret Jones of EPA's Chemicals Management Branch, we have determined that our previous concerns have been addressed.

We appreciate the opportunity to comment on this project. If you have any questions regarding the contents of this letter, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or via email at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth A. Westlake". The signature is fluid and cursive, with the first name "Kenneth" being more prominent.

Kenneth A. Westlake  
Chief, NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

cc: Jack Greenlee, Forest Plant Ecologist  
James McDonald, Regional Environmental Coordinator, USFS, Milwaukee, Wisconsin  
John Peckham, Minnesota Department of Agriculture